

1 Steven R. Manchester (State Bar No. 45589)
2 MANCHESTER, WILLIAMS & SEIBERT
3 125 S. Market Street, Suite 1100
4 San Jose, CA 95113-2286
5 408.287.6193 – Telephone
6 408.287.1554 - Facsimile

FILE

MAY -7 2007

Attorney for Defendant, YUEQIANG CHEN aka BILL CHEN

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

YUEQIANG CHEN aka BILL CHEN,

Defendant.

) Case No. 06-00384 JF

) ~~PROPOSED~~ ORDER PERMITTING THE
) DEFENDANT TO TRAVEL TO CHINA

15 The defendant's motion for permission to travel to China was heard on April 12, 2007,
16 and again on April 30, 2007 before the Honorable Richard Seeborg. The government was
17 represented by Assistant United States Attorney Matthew A. Parrella ("AUSA Parrella") at both
18 proceedings, and the defendant was represented by Steven R. Manchester ("Manchester").
19 Subsequent to the hearing on April 30th, counsel for the defendant submitted a declaration
20 containing the defendant's proposed travel itinerary including air reservations and addresses
21 where the defendant would be staying.

22 Having considered the papers filed by the parties, and the arguments of counsel, IT IS
23 HEREBY ORDERED that the defendant's application to travel to China is granted on the
24 following conditions:
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1 1. That the defendant's wife voluntarily deposit her passport, and the passport of their
2 daughter, into the possession of the defendant's counsel. The delivery shall take place prior to
3 the defendant's departure for China. Manchester shall advise Pretrial Services, and AUSA
4 Parrella of his possession of the passports prior to the defendant's departure, and shall retain
5 possession of the passports until the defendant returns to the United States. If, during the
6 defendant's absence from the United States, the defendant's wife asks Manchester for the return
7 of the passports, Manchester shall immediately give notice to the Court, and to AUSA Parrella.
8 The passports shall not be returned to the defendant's wife until after a hearing has been held
9 before Magistrate Judge Seeborg. Manchester is authorized to return the wife and daughter's
10 passports after the defendant's return to the United States without further notice to the Court or
11 counsel.

12 2. The defendant shall be permitted to travel to China. He may leave the United States on
13 May 10, 2007, and shall return on May 20, 2007. He shall advise Pretrial Services of his
14 departure 24 hours prior thereto, and report to Pretrial Services within 24 hours of his return the
15 United States. The defendant shall adhere to the itinerary supplied to the court by Manchester
16 and the court notifies defendant that any deviation from said itinerary, in the absence of good
17 cause, shall constitute a violation of this order.

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Magistrate Judge Richard Seeborg